

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA

versus

CHALMER DETLING, II

Criminal Action No.:
1:18-CR-00309-LMM-LTW-1

REPLY TO GOVERNMENT’S RESPONSE TO MOTION TO TRAVEL

COMES NOW Defendant, CHALMER E. DETLING, II., by and through undersigned counsel, and files this reply to the government’s response to his Motion to Travel.

(1)

Mr. Detling would like to clarify that the travel he is requesting would involve him leaving his home in the Northern District of Georgia in the early morning hours of April 3, 2022. The motion indicated travel beginning April 2nd because Mr. Detling was requesting to leave prior to 7:00 a.m. when his curfew is typically in effect. Because Mr. Detling would be arriving in New Orleans on April 3rd (the day after the Final Four), the government’s concerns regarding the inflated cost of hotel rooms should be alleviated. Additionally, Mr. Detling would like to clarify that he intends to travel to New Orleans by car rather than by plane. This manner of travel is less expensive and should allay any concerns the Court may have regarding the cost of this brief trip.

(2)

The government's response does not indicate any new information pertaining to their allegations that he is a flight risk. The Court has previously addressed this question and has found that Mr. Detling does not pose a risk of flight.

(3)

Lastly, Mr. Detling denies any allegation or insinuation by the government that he has been dishonest in his prior financial disclosures.

(4)

WHEREFORE, Mr. Detling respectfully requests that this Court grant his Motion to Travel.

Dated: This 30th day of March, 2022.

Respectfully Submitted,

/s/ Caitlyn Wade

Caitlyn Wade

Georgia Bar No. 259114

s/ Suzanne Hashimi

Suzanne Hashimi

State Bar No. 335616

Attorneys for Mr. Detling